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Attorneys for Defendants, Michael Johnson
and PAM International, Inc. i/p/a "PAM
International"

ELIZABETH SHAPIRO AND BRUCE
SHAPIRO

Plaintiffs

v.

MICHAEL JOHNSON, PAM
INTERNATIONAL, JOHN DOE(S) I-V and
ABC CORPORATION, I-V (a series of
fictitious names describing other
operators/owners, lessors/lessees, agents,
employers or persons/entities who benefitted
from the operation of defendants' vehicle at
the time of the within accident)

Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION NO.

CIVIL ACTION

NOTICE OF REMOVAL

Defendants, Michael Johnson and PAM International, Inc. i/p/a "PAM International" (hereinafter jointly referred to as "Defendants") by their undersigned attorneys, and pursuant to the provisions of 28 U.S.C. 1332, 1441 and 1446, hereby remove this action to this Court, and states as follows:

1. This action was initiated on January 25, 2023, in the Superior Court of New Jersey, Morris County, Law Division (Docket No. MRS-L-148-23) with the filing of a Complaint by Plaintiffs Elizabeth Shapiro and Bruce Shapiro against Defendants, alleging a cause of action for

negligence arising from a motor vehicle accident that occurred on Southbound, I-287, Morristown, New Jersey on October 14, 2021, (hereinafter “State Court Action”).

2. Plaintiffs claim that Mrs. Shapiro was caused “to be violently tossed about, sustaining severe injuries, causing permanent disability, permanent significant disfigurement, permanent loss of bodily function, has incurred or in the future will incur expenses for the treatment of said injuries in excess of the applicable threshold, has been and will in the future be disabled and not able to perform her usual functions, has been caused and in the future will be caused great pain and suffering, has been deprived and in the future will be caused great pain and suffering, has been deprived and in the future will be deprived of her right to the enjoyment of life.” See First Count of Complaint at ¶4 at Exhibit “A.”

3. Upon information and belief, Plaintiffs Elizabeth Shapiro and Bruce Shapiro reside at 38 Bissell Road, Lebanon, New Jersey when the Complaint was filed. See Id.

4. Defendant Michael Johnson resides at 530 Herzl Street, Apt. A1 Brooklyn, NY 11212.

5. Defendant PAM International, Inc. has a business address of 261 Republic Ave., Joliet, Illinois 60435. Defendant PAM International, Inc. also has a business address at 160 NW 176th St, Miami Gardens, Florida 33169.

6. Defendant PAM International, Inc. is incorporated in Illinois.

7. The State Court Action is a civil action of which the District Courts of the United States have original jurisdiction by virtue of the federal question subject matter jurisdiction granted by 28 U.S.C. § 1331.

8. Defendant PAM International, Inc., was served with the Complaint on/or about February 12, 2023 by mail.

9. Upon information and belief, Defendant Johnson has not been served with the Complaint.

10. This Notice of Removal is filed within thirty (30) days of receipt by Defendants of notice of the Complaint in the State Court Action. Thus, this Notice of Removal is filed in a timely manner as required by 28 U.S.C. § 1446(b).

11. This Notice of Removal is being filed in the District of New Jersey, the District Court of the United States for the district and division within which the State Court Action is pending, as required by 28 U.S.C. §§ 1446(a) and 1441(a).

12. Attached hereto as **Exhibit B** is a copy of the Notice to Clerk of Superior Court of Filing of Notice of Removal, the original of which is being filed with the Superior Court of New Jersey, Somerset County, Law Division as required by 28 U.S.C. § 1446(d).

13. Attached hereto as **Exhibit C** is a copy of the Notice to Adverse Party of Filing of Notice of Removal, the original of which is being served on Plaintiff's counsel pursuant to 28 U.S.C. § 1446(a).

WHEREFORE, Defendants respectfully request that this action proceed in this Court as an action properly removed to it.

KIRMSER, LAMASTRA, CUNNINGHAM & SKINNER
Attorneys for Defendants, Michael Johnson and PAM International Inc., i/p/a "PAM International"



By: _____
Michael S. Schwartz

Dated: February 28, 2023